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Attorneys for Plaintiff
PENNA PIPER

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

PENNA PIPER, an individual,

Plaintiff,

v.

AMERICAN INSTITUTE FOR FOREIGN
STUDY, INC. dba AU PAIR IN AMERICA,
and DOES 1-10,

Defendant.

) Case No. C 10 0107 JSW

)
) **JOINT STIPULATION RE CASE**
) **MANAGEMENT CONFERENCE**
) **DATES AND ORDER THEREON**

)
)
) (Marin County Superior Court, Case No.
) CIV 095805)

) Complaint Filed: November 16, 2009

The Parties to the above entitled action, American Institute for Foreign Study, Inc. dba Au Pair in America ("Defendant") and Penna Piper ("Plaintiff") (collectively referred to as the "Parties"), by and through their undersigned counsel, hereby stipulate and agree as follows:

1. The Parties attended a Case Management Conference in this Court on December 17, 2010 wherein this Court required the Parties to submit a stipulation to further case management dates, including a further Case Management Conference, by December 22, 2010.

2. Due to the Plaintiff's ongoing health issues, and through no fault of either party or their counsel, Defendant has been unable to complete the Plaintiff's deposition. The Parties agree that substantial completion of Plaintiff's deposition is essential to their ability to mediate this matter or otherwise work toward settlement of Plaintiff's claims. The Parties plan to continue Plaintiff's deposition in January 2011.

3. Pursuant to the directions of this Court as stated during the December 17, 2010 Case Management Conference, the Parties will complete private mediation by February 15, 2011. If the Parties require additional time to effectively complete private mediation, they will stipulate to a future date and provide this Court an explanation of good cause as to why the mediation deadline must be continued.

4. The Parties have met and conferred and propose the following case management dates:

April 2, 2012 8:00 a.m.

(a) The trial date will be set for Monday, ~~January 30, 2012~~ at ~~8:30 a.m.~~

(b) The Pre-Trial Conference will be set for Monday, ~~January 9, 2012~~ at 2:00 p.m. ^{March 12, 2012}

(c) The Joint Proposed Final Pre-Trial Order will be due on Monday, December 26, 2011.

(d) The non-expert discovery cutoff will be September 26, 2011.

(e) The expert discovery cutoff date will be December 30, 2011.

(f) The expert witness disclosure deadline will be October 25, 2011.

(g) The last date on which dispositive motion(s) can be heard will be

~~November 18, 2011.~~ December 9, 2011 at 9:00 a.m.

(h) A further Case Management Conference shall be held on Friday, July 29, 2011 at 1:30 p.m.

(i) The Parties will submit a supplemental Joint Case Management Conference Statement in preparation for the further Case Management Conference by Friday, July 22, 2011.

5. The Parties believe that setting a trial date and other accompanying dates in this matter is premature given the inability to fully evaluate the claims and defenses. The Parties submit this Stipulation in accordance with this Court's instructions as stated during the December 17, 2010 Case Management Conference in which this Court required the parties to set a date for a further Case Management Conference. The Parties reserve the right at the further Case Management Conference set for July 29, 2011 to request additional time to prepare for trial and extend the accompanying case management dates should the Parties believe such time is necessary.

NOW THEREFORE, all Parties hereto stipulate and agree that the Court may enter an Order setting the trial date and pre-trial deadlines in accordance with the schedule set forth in Section 4(a-i) above.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: December 23, 2010

SEYFARTH SHAW LLP

By /s/ Michael J. Burns
Michael J. Burns

Attorneys for Defendant
AMERICAN INSTITUTE FOR FOREIGN
STUDY, INC. dba AU PAIR IN AMERICA

DATED: December 23, 2010

LAW OFFICES OF STEVEN KESTEN

BY /s/ Steven Kesten
Steven Kesten

Attorneys for Plaintiff
PENNA PIPER

1 DATED: December 23, 2010

LAW OFFICES OF LAWRENCE A. ORGAN

2
3 BY /s/ Lawrence A. Organ
Lawrence A. Organ

4 Attorneys for Plaintiff
5 PENNA PIPER

6 IT IS SO ORDERED.

7 Dated: January 4, 2011

8 
Honorable Jeffrey S. White

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